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Supreme Court of the United States

October Term, 1976

No. 76 - 326

ANDREW J. HINSHAW,

Petitioner,

vs.

STATE OF CALIFORNIA,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE SUPREME COURT OF THE STATE OF CALIFORNIA

BRIEF FOR RESPONDENT IN OPPOSITION

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IN THE SUPREME COURT OF THE UNITED STATES

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OPINION BELOW

The Supreme Court of the State of California summarily denied a petition for hearing to review the order of the Superior Court of the State of California for the County of Orange which denied the motion to dismiss the amended grand jury indictment. The minute order of the California Supreme Court denying said

petition appears as Appendix "C" to petitioner's Jurisdictional Statement. A Petition for Writ of Prohibition/Mandamus to dismiss said indictment was taken to the Court of Appeal of the State of California, Fourth District, Division Two, and was summarily denied. The minute order of the Court of Appeal denying said petition appears as Appendix "B" to petitioner's Jurisdictional Statement.

JURISDICTION

It is respectfully submitted that the petition in the instant case is not within the jurisdiction of this Court and is not taken in conformity to statute or to the rules of this Court. As discussed hereafter, petitioner's reliance upon 28 U.S.C. § 1257 as purportedly conferring jurisdiction on this Court of certiorari is unwarranted.

QUESTIONS PRESENTED

1. Whether an order by the California Supreme Court denying discretionary intermediate relief is a "final" judgment reviewable by the Supreme Court of the United States under 28 U.S.C. § 1257?

2. Whether the question as to the deprivation of petitioner's constitutional right to due process of law and equal protection of laws under the Fourteenth Amendment by Article 1 § 14 of the California Constitution which provides for the initiation of felony prosecutions by indictment or by information and by the failure to provide

petitioner with a postindictment probable cause hearing is properly before the Supreme Court where that question has never been raised in the trial court?

3. Whether the question as to the deprivation of petitioner's constitutional right to due process of law and equal protection of the laws under the Fourteenth Amendment by the alleged concealment by the District Attorney of exculpatory evidence from the grand jury is properly before the Supreme Court?

STATUTES INVOLVED

Article 1 § 14 of the California Constitution and Section 1237 of the California Penal Code are set forth as Appendix "A" and Appendix "B" respectively.

STATEMENT OF THE CASE

On December 11, 1974, nine members of the Orange County Assessor's office were indicted for violations of the California Penal Code which arose from work performed by them on petitioner's 1972 campaign for a seat in Congress from the 39th Congressional District in California on County time. Further grand jury hearings were held and on May 6, 1975, an amended indictment was filed which added petitioner as a defendant and which added counts by which petitioner was charged with two counts of conspiracy, and violations of Penal Code Section 424 (Embezzlement and Falsification of Accounts by Public

Officers; Misappropriation of Public Monies), and Penal Code Section 484 (Grand Theft). On May 8, 1975, petitioner was arraigned, and on May 29, 1975, petitioner entered a plea of not guilty.

The trial in the matter is presently proceeding. It is anticipated final argument and jury instructions will commence during the week beginning November 22, 1976. This will be the culmination of a trial which has lasted in excess of two months.

On June 21, 1976, petitioner filed a pretrial motion to dismiss the amended indictment on the ground that he had been denied his constitutional right to due process of law when the District Attorney failed to inform the grand jury of alleged exculpatory evidence, as required by the California Supreme Court decision of *Johnson v. Superior Court* (1975) 15 Cal. 3d 248, 124 Cal. Rptr. 32, 539 P.2d 792, in its construction of California Penal Code Section 939.7. The alleged exculpatory evidence of which the District Attorney had knowledge was the claimed consent by the County of Orange to the activities in the Assessor's office which were the subject of the indictments returned in the instant case.

At the pretrial motion to dismiss the amended indictment, evidence was taken by the trial court concerning the alleged exculpatory evidence. Parties for both sides urged the trial court to rule on the merits of petitioner's motion to dismiss. The motion to dismiss was denied by the trial court on July 26, 1976, on the ground that *People v. McAllister* (1976) 54 Cal. App. 3d 918, 126 Cal. Rptr. 881, held that *Johnson v. Superior Court, supra,* is not retroactive.

During the trial in the instant matter, petitioner sought to introduce the evidence received during the motion to dismiss the indictment pertaining to the alleged consent. The trial court rejected petitioner's offer of said evidence on the ground of relevance and ruled that the proffered evidence did not show consent.

At no time in the trial court has petitioner moved to quash or object to the indictment on the ground that initiating felony prosecutions by indictment rather than by information deprives petitioner of due process of law and equal protection of the laws under the Fourteenth Amendment. At no time in the trial court has petitioner requested or demanded a postindictment probable cause hearing. The propriety of such a demand was left unanswered by *Johnson v. Superior Court, supra,* at page 270, since the question had not been directly raised and argued by the parties.

On July 27, 1976, petitioner's Petition for Writ of Prohibition/Mandamus was denied without opinion by the Fourth District Court of Appeal.

On August 30, 1976, petitioner's Petition for Hearing in the Supreme Court of California was denied without opinion.

ARGUMENT

I

An Order Of The California Supreme Court Denying Discretionary Intermediate Relief Is Not A "Final" Judgment Reviewable By The Supreme Court Of The United States Under 28 U.S.C. § 1257.

Under California procedure, a defendant is not entitled to appeal a ruling made by the trial judge in Superior Court until after a final judgment of conviction [California Penal Code § 1237]. There is no direct appeal from an order denying a motion to set aside an accusatory pleading. The order is reviewable on appeal only from the judgment itself. *Greenbery v. Superior Court* (1942) 19 Cal. 2d 319, 322-323, 121 P.2d 713; *People v. Malich* (1971) 15 Cal. App. 3d 253, 264-265, 93 Cal. Rptr. 87; *People v. Egan* (1946) 73 Cal. App. 2d 894, 897-898, 167 P.2d 766.

The use of the "extraordinary and "prerogative" writs of mandate and prohibition have long been recognized in California to afford appellate review of interim orders of trial courts in cases not yet disposed of by an appealable judgment. [See *Witkin*, California Criminal Procedure (1963) section 788.] Unlike review by appeal, which is a matter of right following a final judgment of conviction, the issuance of "extraordinary" and "prerogative" writs is directed to the "sound" discretion of the reviewing court. *Pac. Tel. & Tel. Co. v. Superior Court* (1970) 2 Cal. 3d 161, 169, 84 Cal. Rptr. 718, 465 P.2d 854.

An order of the California Supreme Court which denies without opinion a petition for interim appellate review by an "extraordinary" writ in lieu of appeal is subject to further review on a subsequent appeal. Such an order is not the determination of a "cause". In determining a "cause" the California Supreme Court and California Courts of Appeal are required by the California Constitution to render a formal opinion. Cal.

Const. Art. VI § 14. A summary denial of a "petition for hearing" without issuance of an order to show cause, without oral argument and without formal opinion is not a decision of a "cause" on its merits. *Funeral Dir. Assn. v. Bd. of Funeral Dirs.* (1943) 22 Cal. 2d 104, 106, 136 P.2d 785.

The order of the California Supreme Court from which petitioner seeks relief by this Court is not a final judgment. Neither the California Supreme Court nor any other California appellate court has decided the questions raised by petitioner in his petition. Under California procedure, petitioner may raise the questions presented in the petition anew upon appeal from a judgment entered by the Superior Court. At such time the parties will have an opportunity to brief and argue the case in full. *People v. Shuey* (1975) 13 Cal. 3d 835, 844-846, 120 Cal. Rptr. 83, 533 P.2d 211; *People v. Medina* (1972) 6 Cal. 3d 484, 490-492, 99 Cal. Rptr. 630, 492 P.2d 686; *Rosato v. Superior Court* (1975) 51 Cal. App. 3d 190, 230-231, 124 Cal. Rptr. 427; *Laucirica v. Workmen's Comp. Appeals Bd.* (1971) 17 Cal. App. 3d 681, 684, 95 Cal. Rptr. 219.

Respondent submits that the order of the California Supreme Court denying petitioner's request for a hearing is not a "final" judgment within the meaning of 28 U.S.C. § 1257, which restricts this Court's jurisdiction to review state court decisions. In petitioner's present procedural posture, he is requesting the Court to grant certiorari to review a decision rendered by the trial court. If certiorari were granted, the appellate courts of California would be deprived of an opportunity to pass upon petitioner's assertions of federal constitutional error.

In *Arceneaux v. Louisiana* (1964) 376 U.S. 336, 11 L. Ed. 2d 750, 84 S. Ct. 777, this Court dismissed a writ of certiorari previously granted to review an order of a Louisiana trial court recalling an order for a preliminary hearing in a vagrancy case. The petitioner in *Arceneaux* sought review of that order by seeking certiorari from a denial of intermediate relief by the Louisiana Supreme Court. As in California, Louisiana procedures permitted appeals only from orders which finally disposed of criminal cases. This Court held:

> "The ruling complained of as referred to by the Louisiana Supreme Court can only be the order recalling the order for a preliminary hearing. Under our decisions in the criminal field, such denial of intermediate relief in state criminal cases is similar to an order overruling a plea in bar (*Eastman v. Ohio*, 299 U.S. 505, 81 L. Ed. 374, 57 S. Ct. 21) or overruling a demurrer to an indictment (*Polakous Realty Experts v. Alabama*, 319 U.S. 750, 87 L. Ed. 1705, 63 S. Ct. 1155). Hence under 28 U.S.C. § 1257, denial of the preliminary hearing in a vagrancy case of this nature is not a 'final' judgment." 376 U.S. at 338.

Similarly, in *Whitus v. Georgia* (1967) 385 U.S. 545, 17 L. Ed. 2d 599, 87 S. Ct. 643, this Court held that the question of whether a grand jury was discriminatorily selected was reviewable after conviction from a decision of the Georgia Supreme Court affirming the conviction, but not after an interlocutory appeal authorized by state law.

More recently, in *Costarelli v. Massachusetts* (1975) 421 U.S. 193, 44 L. Ed. 2d 76, 95 S. Ct. 1534, the appellant took

an appeal to this Court without first initially seeking a full review of his federal constitutional claim in the state court. This Honorable Court found lack of jurisdiction since there had been no decision sought or rendered by the highest state court in Massachusetts in which a decision could be had.

In the case at bar, petitioner can obtain state appellate review of his federal constitutional claim upon proper presentment on appeal. It is respectfully submitted the granting of certiorari would result in the needless interference with state proceedings which are not, as yet, "finally" resolved.

II

The Question As To Whether Article 1 § 14 Of The California Constitution Providing For The Initiation Of Felony Prosecutions By Either Indictment Or Information And The Failure To Provide A Postindictment Probable Cause Hearing Deprives The Petitioner Of The Equal Protection Of Laws And The Due Process of Law Under The Fourteenth Amendment Is Not Properly Before The Supreme Court Where That Question Has Never Been Raised In The Trial Court.

As of this date, petitioner has failed to object in the trial court to an indictment by grand jury as a vehicle for initiating a felony prosecution. Moreover, petitioner has neither claimed he was denied equal protection of laws and due process of law under the Fourteenth Amendment because the prosecution was initiated by indictment rather than information, nor has he requested or demanded a postindictment preliminary examination. Petitioner has failed to take any steps in the trial court

to preserve his claim of federal constitutional error on this question.

Under California procedure a defendant who fails to raise contentions of federal constitutional irregularity in the trial court waives them. Similarly, by failing to raise such contention by objection or motion, a defendant is precluded from making them on appeal. *People v. Sirhan* (1972) 7 Cal. 3d 710, 754-755, 102 Cal. Rptr. 385, 497 P.2d 1121, *cert. den.* 410 U.S. 947.

This Court has consistently held it is without power to decide whether constitutional rights have been violated when the federal questions are not preserved in accordance with state law requirements. Unless it appears on the record that a federal question was both raised and decided in the state court, the appellate jurisdiction of this Court fails. *Cardinale v. Louisiana* (1969) 394 U.S. 437, 22 L. Ed. 398, 89 S. Ct. 1162; *Ferguson v. Georgia* (1960) 365 U.S. 570, 5 L. Ed. 783, 81 S. Ct. 756; *Edleman v. California* (1952) 344 U.S. 357, 97 L. Ed. 387, 73 S. Ct. 293; *Hulbert v. Chicago* (1906) 202 U.S. 275, 50 L. Ed. 1026, 26 S. Ct. 617.

III

The Question As To Whether The Alleged Concealment By The District Attorney Of Exculpatory Evidence From The Grand Jury Deprives The Petitioner Of The Equal Protection Of Laws And Due Process Of Law Under The Fourteenth Amendment Is Not Properly Before The Supreme Court.

California generally recognizes the defense of consent in prosecutions for theft. *People v. Werner* (1940) 16 Cal. 2d

216, 224, 105 P.2d 927. Despite this general rule the defense has no application where the theft involves the taking of public monies, since no one has the authority to consent to the taking or use of public funds. In this regard the general rule is that the apparent consent of a person without legal capacity to give the consent is ineffective. (See *Witkin*, California Crimes (1963), § 173, page 165.)

In the instant matter, since the object of the theft is public funds, there is no one who has the authority to consent to their illegal use. *Stanson v. Mott* (1976) 17 Cal. 3d 206, ... Cal. Rptr. ....., ... P.2d .....; *People v. Harby* (1942) 51 Cal. App. 2d 759, 125 P.2d 814.

Article 11 § 10 of the California Constitution provides:

> "A local government body may not grant extra compensation or extra allowances to a public officer, public employee, or contractor after services have been entered into and performed in whole or in part, or pay a claim under an agreement made without authority of law."

Article 16 § 6 of the California Constitution provides in part as follows:

> "The Legislature shall have no power to give or to lend, or to authorize the giving, or lending, of the credit of the State, or of any county, city and county, city, township or other political corporation or subdivision of the state now existing, or that may be hereafter established, in aid of any person, association, or corporation, whether municipal or otherwise, . . . ; nor shall it have the power to make any gift or authorize the making of any gift, of any public money or thing of value

to any individual, municipal or other corporation whatever; . . . . "

As of this time, the trial judge has not found it necessary to rule the defense of consent unavailable to the petitioner in the instant case. Respondent has relied on this rule of law in conducting the prosecution of the instant matter, both at trial and before the grand jury. In the former proceeding the trial court ruled that the evidence proffered by the petitioner was insufficient to show consent and was, thus, irrelevant. In the latter proceeding, although the trial court received evidence on the issue of consent which was allegedly exculpatory, it chose to deny petitioner's motion to dismiss the indictment on procedural grounds.

The lack of merit of petitioner's claim of federal constitutional error is a part of the record. Respondent respectfully suggests to this Court that the California appellate courts should be given an opportunity to review the entire record and decide whether respondent's contention that the unavailability of the defense of consent to the petitioner is a separate ground for sustaining the ruling of the trial court.

The alleged wrongdoing of the District Attorney before the grand jury may not be considered a question of a deliberate attempt on the part of the prosecutor to charge an innocent citizen with an unfounded charge. Rather it is a dispute between the parties in the matter as to questions of law and fact. The California Supreme Court has imposed a duty upon all California prosecutors to advise a grand jury of evidence which *reasonably* tends to negate guilt. *Johnson v. Superior Court, supra,* at page 255. The federal system recognizes no such obligation on the part of the prosecution. *United States v. Hata* (1976) 535 F.2d 508, 512. Grand jury proceedings are ex parte investigations to determine whether criminal proceedings should be instituted, not mini-trials. *United States v. Calandra* (1974) 414 U.S. 338, 343-344, 38 L. Ed. 2d 561, 94 S. Ct. 613; *United States v. Dionisio* (1973) 410 U.S. 1, 16-17, 35 L. Ed. 2d 67, 93 S. Ct. 764.

CONCLUSION

For the foregoing reasons, it is respectfully submitted that this Petition for a Writ of Certiorari should be denied.

Respectfully submitted,

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California Constitution Article I § 14

Felonies shall be prosecuted as provided by law, either by indictment or, after examination and commitment by a magistrate, by information.

A person charged with a felony by complaint subscribed under penalty of perjury and on file in a court in the county where the felony is triable shall be taken without unnecessary delay before a magistrate of that court. The magistrate shall immediately give the defendant a copy of the complaint, inform the defendant of the defendant's right to counsel, allow the defendant a reasonable time to send for counsel, and on the defendant's request read the complaint to the defendant. On the defendant's request the magistrate shall require a peace officer to transmit within the county where the court is located a message to counsel named by defendant.

A person unable to understand English who is charged with a crime has a right to an interpreter throughout the proceedings.

(California Constitution, Article I § 14, Deering's Annotated Articles, pg. 55, 1976 Pocket Supplement)

APPENDIX "B"

California Penal Code § 1237

An appeal may be taken by the defendant:

1. From a final judgment of conviction except as provided in Section 1237.5. A sentence, an order granting probation, or the commitment of a defendant for insanity, or the indeterminate commitment of a defendant as a mentally disordered sex offender shall be deemed to be final judgment within the meaning of this section. The commitment of a defendant for narcotics addiction shall be deemed to be a final judgment within the meaning of this section 90 days after such commitment. Upon appeal from a final judgment the court may review any order denying a motion for a new trial.

2. From any order made after judgment, affecting the substantial rights of the party.

(California Penal Code § 1237, Deering's Annotated Articles, pg. 107)

STATE OF CALIFORNIA)
)
County of Orange)

I, the undersigned, say: I am and was at all times herein mentioned, a citizen of the United States and employed in the County of Orange, State of California, over the age of eighteen years and not a party to the within action or proceeding; that

My business address is 326½ Main Street, Huntington Beach, California 92648, that on NOVEMBER 24, 1976, I served the within BRIEF FOR RESPONDENT IN OPPOSITION (NO. 76 - 326 - UNITED STATES SUPREME COURT) on the following named parties by depositing a copy thereof, enclosed in a sealed envelope with postage thereon fully prepaid, in the United States Post Office in the City of Huntington Beach, California, addressed to said parties at the addresses as follows:

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(2 copies)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on NOVEMBER 24th, 1976, at HUNTINGTON BEACH, CALIFORNIA.

D. A. Standefer

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